

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JIMMY ADAMS, MOSES AGBOOLA, §
ERIC AZUBUIKE, DRUSILLA BAILEY, §
DELIAH BROWN, FELICIA RUCKER- §
CARTER, PAULINA CARY, HYGINUS §
CHUKWU, AVA COSEY, TERRENCE §
CROSBY, LINDA DENKINS, BRIGETTE §
DENNIS, CHARLES DRAYDEN, LORLIE §
ELLIS, AYOADE FARINDE, JONAH §
FORD, ROSALYN FRANCIS, CHERYL §
GOODE, BRANDY GRIFFIN, SHULETA §
HARRIS, AFRAH HASSAN, QUINCY §
HENDERSON, CLENNIS HIGH, AVIS §
HORDE, ERICA HUBBARD, RODNEY §
JACKSON, VERNITA JACKSON, CHINA §
JENKINS, MICHELLE JOHNSON, §
ANDREA JONES, SHALNADRIA JONES, §
STEPHANIE JONES, ELLAMEES KELLY- §
MOLO, ELFREDA KING, DORIS LACEY, §
KIMBERLY MASON, DEBRA §
MCGAUGHEY, LUE MIMS, KISHMA §
MORANCIE, MARY PAGE, RUTH §
PARHAM, BEVERLY PERRY, §
FREDRICK PORTIS, REYNALDO §
PRADIA, ERICA RHONE, DEBRA §
ROBINSON, TIFFANY ROUBLEAU, §
MELODY DANCER SAMUELS, SAMOAN §
SCOTT, SHONNA STOOT, LEON §
THIBODEAUX, GODWIN §
UNUIGBOKHAI, DORSETTA WILLIAMS, §
MARCUS WINTERS, AND LAQUINTA §
VARGAS §

Plaintiffs, §

v. §

HOUSTON COMMUNITY COLLEGE §
SYSTEM §

Defendant. §

CIVIL ACTION NO. 4:22-cv-01547

JURY DEMANDED

**PLAINTIFFS' NOTICE OF FILING OF CERTIFICATE OF CONFERENCE AND
PROPOSED ORDER RELATING TO DKT. 39 SUGGESTION OF DEATH OF
HYGINUS CHUKWU AND MOTION TO SUBSTITUTE PURSUANT TO FRCP 25**

TO THE HONORABLE DISTRICT COURT JUDGE:

1. Counsel for Plaintiffs in the above-referenced action gives notice that on June 8, 2023, Plaintiffs filed a Suggestion of Death of Hyginus Chukwu and Motion to Substitute Pursuant to FRCP 25. Plaintiffs have since conferred with opposing counsel who have advised that they do not oppose the motion. Accordingly, Plaintiffs' counsel files the following certificate of conference:

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of July 2023, I spoke with opposing counsel regarding the Suggestion of Death of Hyginus Chukwu and Motion to Substitute Pursuant to FRCP 25 (Dkt. 39) and opposing counsel confirmed that they do not oppose the motion.

/s/ Ryan Finnegan
Ryan Finnegan

2. Counsel for Plaintiffs also provide the Court with a proposed order granting the motion to substitute, which is attached to this filing as **Exhibit 1**.

PRAYER

Plaintiffs pray the Court grant the Motion and that "Evelyn Ifeoma Chukwu, Sole Distributee of the Estate of Hyginus Chukwu, Deceased" be substituted in place of "Hyginus Chukwu" as plaintiff in this action, represented by the undersigned counsel, so that Decedent's claims survive, and the action on his behalf may proceed. Plaintiffs pray for any and all further relief that they may be justly entitled to in either law or equity.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of July 2023, a true and correct copy of the foregoing document was forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Ryan Finnegan
Ryan Finnegan